United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Monday, October 15, 2007
From: Tom Cook, OSC

To:
John Maritote, U.S. EPA ERB
David Chung, U.S. EPA
Afif Marouf, U.S. EPA
Mike Harris, U.S. EPA
Peter Felitti , U.S. EPA
Mick Hans, U.S. EPA
Linda Nachowicz, U.S. EPA
Bruce Everetts, IEPA
Rosauro Delrosario, U.S. EPA
Valerie Mullins , U.S. EPA

Subject: Peoples Gas Hough Place Station Site
2500 South Corbett Street, Chicago, IL
Latitude: 41.8469
Longitude: -87.6503

POLREP No.:	8	**Site #:**	B5HH
Reporting Period:	9/15/07 - 9/30/07	**D.O. #:**	Not Applicable
Start Date:	6/18/2007	**Response Authority:**	CERCLA
Mob Date:	6/18/2007	**Response Type:**	Time-Critical
Completion Date:		**NPL Status:**	Non NPL
CERCLIS ID #:	ILN000510190	**Incident Category:**	Removal Action
RCRIS ID #:		**Contract #**	EP-S5-06-04

Site Description

The Hough Place Station Site (Site) is located at 2500 South Corbett Street, Chicago, Cook County, Illinois, in a mixed residential, commercial, and industrial area. The site is approximately 4.5 acres and is bordered to the north by the South Branch of the Chicago River, to the east by a paper storage and distribution facility, to the south by railroad property, and to the west by vacant property. The vacant property to the west and the Site is currently owned by Crowley□s Yacht Yard which previously operated a sailboat storage, sales, and repair facility at the Site.

The Site is a former manufactured gas plant (MGP) that operated as an MGP facility from approximately 1886 to 1934. The Site was built in 1985 by the Equitable Gas Light and Fuel Company and in 1892 began producing □Pintsch gas,□ a relatively high quality gas produced by an oil gas process, for the Pintsch Compressing Company. Production of Pintsch gas occurred until about the early 1920s. In 1897 Peoples Gas acquired the facility and dismantled the station in 1934. Portions of the property were subsequently leased to other companies who used the property for storage of building materials and the production of asphalt, concrete, and other paving materials until approximately 1950. In 1953, Chicago Title and Trust Company took possession of the property as trustee. From approximately

1953 and 1978, the J.M. Corbett Company operated an asphalt mixing plant on the property. In 1978, Crowley□s Yacht Yard bought the property.

From 2000 to November 2006, several investigations were conducted by Peoples Gas at the Site. These investigations included the excavation of test pits, the installation of shallow monitoring wells, the collection of soil borings, the collection of soil and groundwater samples, a geotechnical investigation, and borings into river sediments. Test pits revealed staining and odors, and black asphalt tar at 2 feet below ground surface (bgs). Benzene, toluene, ethylbenzene, and xylene (BTEX); polynuclear aromatic hydrocarbons (PAH); metals, and cyanide were detected in several surface and subsurface soil samples. BTEX, PAHs, and metals were also detected in groundwater samples collected at the Site. Soil borings indicated tar at levels below the water level in the filled-in boat slip. The river investigation revealed sheens, odors, tar coated/stained material, and traces of tar in some of the sediment borings.

Remediation activities by Peoples Gas began in November 2006 under the Illinois Environmental Protection Agency (IEPA) Site Remediation Program. The PRP contractor remediating the Site is Burns & McDonnell Engineering Company, Inc. (BMcD) along with their subcontractors.

Remediation consists of excavation and disposal of contaminated soils. Excavation depths range from approximately 3 feet to 24 feet bgs. Other site activities by the potentially responsible party (PRP) include daily air monitoring, continuous 24-hour perimeter air monitoring and sampling, confirmation soil sampling, and water treatment, sampling and disposal.

Prior to the U.S. EPA oversight at the Site, BMcD completed excavation of impacted material in excavation cells CF01 to CF58 (see BMcD map of excavation areas under □documents□ on the OSC website). An Administrative Order on Consent was signed by Peoples Gas in early June 2007 prompting the U.S. Environmental Protection Agency (U.S. EPA) to begin PRP oversight activities at the Site.

On June 12, 2007, a kick-off meeting was held at the 22nd Street Site between U.S. EPA, START, Peoples Gas, and BMcD, to discuss future oversight activities, documents required, and logistics for transmitting data and documents. The meeting addressed three MGP sites that U.S. EPA would be overseeing, all located within one mile of each other: 22nd Street Station, Hough Place, and Pitney Court. Note that one START member is to cover oversight of these three sites and will rotate to a different site each day. Both Hough Place and Pitney Court remediations are expected to be completed by end of 2007 while the 22nd Street Station Site remediation is expected to be completed by the end of 2008.

On June 18, 2007, U.S. EPA began PRP oversight activities at the three Peoples Gas MGP sites: Hough Place Station, Pitney Court, and 22nd Street Station. The U.S. EPA Superfund Technical and Response Team (START) contractor is performing PRP oversight during the removal activities at the sites. As part of the removal activities, START collects or observes the collection of confirmation samples of soil to confirm that the PRP cleanup objectives are

being met. Site contaminants of concern are:

- BTEX;
- PAHs;
- Synthetic precipitation leaching procedure (SPLP) lead, chromium, and selenium.

Soil cleanup objectives are for the Hough Place Station Site are IEPA TACO Tier I residential standards for soil ingestion and inhalation.

In August 2007, Metropolitan Water Reclamation District of Greater Chicago (MWRD) finalized the discharge permit that authorizes treatment and discharge of treated Site water to an onsite MWRD sanitary sewer. START collects or observes the collection of treatment water samples to confirm that the MWRD objectives are being met. Samples are being collected to identify the potential presence of the following site contaminants of concern:

- Target Compound List (TCL) VOC;
- PAH; and
- Target Analyte List (TAL) Metals.

Treated water objectives for the Site are established by MWRD in the discharge permit issued for the site.

Current Activities

During the reporting period, the PRP excavated cells CF80, CF82, CF83, CF84, CF85, CF74, CF75, CF76 and CF79. The PRP conducted confirmation sampling of confirmation cells 80, 82, 79, 84, 78, 73, 74, 75, 85, and the MWRD water treatment system.

To facilitate future remediation activities at the north boundary of the site, the PRP directed removal of the dock along the river. The PRP also finalized an access agreement to conduct remediation activities in a utility easement east adjacent to the current site fence line. Preliminary site preparation has begun in the easement along the east site boundary, along Hough Slip.

A summary of the activities performed during the reporting period are as follows:

- Transported 292 loads to CID Landfill in Calumet City, Illinois; truck tires decontaminated prior to leaving site.
- Performed perimeter air sampling and air monitoring on a continuous basis (24-hour air samples and air monitoring is conducted around the perimeter). On September 18 and 28, 2007, one dust air level exceedence was detected.
- Performed health and safety air monitoring during site activities.
- Performed street sweeping activities in front of the Site and along Senour Street.
- Performed daily de-watering activities in excavation areas. Performed water treatment and discharged 687,610 gallons of treated water to the MWRD system.
- Performed dust suppression activities on-site and along Senour Street with use of a water truck.

- Transported 0 loads of concrete from excavation areas to Vulcan for recycling.
- Collected confirmation soil samples from excavation cells 73, 74, 75, 78, 79, 80, 82, 84, and 85.
- Backfilled completed excavation cells.
- Collected one confirmation water sample from the water treatment system.

On September 18, 2007, START personnel observed as BMcD collected one soil sample each from the floor of CF82 and the floor and north wall of CF80. The samples were analyzed for BTEX and PAHs. The soil sample results met the PRP cleanup levels as stated in the Remedial Action Plan (RAP).

On August 31, 2007, BMcD collected one soil sample from CF79 floor (Evans Slip) and submitted it for BTEX and PAHs analysis. The sample results indicated that a ten foot deep engineered barrier would be required to eliminate exposure pathways and meet the PRP cleanup levels as stated in the RAP. Because the final grade for the site is yet to be determined, the PRP decided to excavation additional soil from CF79, for a final depth of 11 feet bgs. On September 20, 2007, START personnel observed as BMcD collected one soil sample from the floor of CF79. The sample was analyzed for BTEX, PAHs and SPLP metals. The sample results again indicated that BTEX and PAH objectives were exceeded, and an engineered barrier is required to meet the PRP cleanup levels as stated in the RAP. The SPLP metals results have not yet been reported.

On September 20, 2007, START personnel collected one confirmation soil sample from the floor of excavation cell CF84, along with BMcD. The sample was analyzed for BTEX and PAHs. The soil sample results met the PRP cleanup levels as stated in the RAP.

On September 20, 2007, START personnel observed as BMCD also collected one soil sample each from the north and west walls of CF78. The samples were analyzed for BTEX and PAHs. The sample results for the north and west walls of CF78 indicated that cleanup objectives were exceeded, and an engineered barrier is required to meet the PRP cleanup levels as stated in the RAP. Visible impacts were also observed in the west wall of CF78, which the PRP will excavate in coordination with future backfilling activities.

On September 25, 2007, START personnel observed as BMCD collected one soil sample each from the north wall of CF73, and the floors of CF74 and CF75. The samples were analyzed for BTEX and PAHs. Results have not yet been reported by BMcD.

On September 26, 2007, START personnel collected one confirmation soil sample from the floor of excavation cell CF85, along with BMcD. START personnel also observed as BMCD collected one soil sample from the north wall of CF74. The samples were analyzed for BTEX and PAHs. The results for soil sample CF85, collected by START, met the PRP cleanup levels as stated in the RAP. Results for CF85 and CF74 have not yet been reported by BMcD.

On September 26, 2007, START personnel observed as BMcD collected a treated water sample from the discharge hose of the water treatment system. The sample was analyzed

according to the SDA-002 parameters specified by MWRD in the discharge permit. Results have not yet been reported by BMcD.

Analytical results from previous sampling events have been received and evaluated by START:

On August 2, 2007, BMcD collected one soil sample each from the floor and west wall of CF67. The samples were analyzed for BTEX and PAHs. BMcD reported that the soil sample results for the floor of CF67 met the PRP cleanup levels. However, the sample results for the west wall of CF67 indicated that cleanup objectives were exceeded, and an engineered barrier is required to meet the PRP cleanup levels as stated in the RAP.

On August 3, 2007, BMcD collected one soil sample from the floor of CF68. The sample was analyzed for BTEX, PAHs and SPLP metals. BMcD reported that the soil sample results for BTEX and PAH met the PRP cleanup levels as stated in the RAP. Results for SPLP metals have not yet been reported by BMcD.

On August 7, 2007, BMcD collected one soil sample from the floor of CF69. The sample was analyzed for BTEX and PAHs. BMcD reported that the soil sample results met the PRP cleanup levels as stated in the RAP.

On August 10, 2007, BMcD collected one investigative soil sample from the floor of Test Pit 49 (depth 9 feet bgs), located along the south boundary of the site. The sample was analyzed for BTEX and PAHs. BMcD reported no detections of BTEX or PAHs.

On August 13, 2007, BMcD collected one soil sample each from the east wall of CF69 and the north wall of CF67. On August 15, 2007, BMcD collected one soil sample from the floor of CF70. The samples were analyzed for BTEX and PAHs. BMcD reported that the soil sample results met the PRP cleanup levels as stated in the RAP.

On August 15, 2007, BMcD collected one investigative soil sample from the floor of Test Pit 53 (depth 16-17 feet bgs), located at the northwest corner of the site. The sample was analyzed for BTEX and PAHs. BMcD reported that sample results indicate contamination in this area.

On August 16, 2007, BMcD collected one soil sample each from the floors of CF71 and CF72. The samples were analyzed for BTEX and PAHs. BMcD reported that the soil sample results met the PRP cleanup levels as stated in the RAP.

On August 21, 2007, BMcD and START both collected one soil sample from the floor of CF73, and submitted it for BTEX, PAH and SPLP metals analysis. The soil sample results met the PRP cleanup levels as stated in the RAP.

On September 11, 2007, BMcD collected one soil sample each from the floor, west wall and north wall of CF77. The samples were analyzed for BTEX and PAHs. BMcD reported that the soil sample results met the PRP cleanup levels as stated in the RAP.

On September 12, 2007, START personnel collected one confirmation soil sample from the floor of excavation cell CF81, along with BMcD. The sample was analyzed for BTEX and PAHs. The soil sample results met the PRP cleanup levels as stated in the RAP.

START is awaiting laboratory results for the following sample: monthly discharge water sample (collected September 6, 2007).

Planned Removal Actions
Planned removal actions at the Hough Place Station Site are as follows:

- ☐ Excavate soil per the RAP
- ☐ Transport excavated soil to CID Landfill for disposal
- ☐ De-water excavation areas
- ☐ Treat and dispose water onsite to the MWRD system
- ☐ Backfill completed excavation areas

Next Steps
The next steps to be carried out by the PRP are as follows:

- ☐ Complete excavation of cells CF 83; including disposal of soil
- ☐ Begin excavation of cell CF86
- ☐ Continue to de-water excavation areas as required
- ☐ Treat water and discharge to MWRD system
- ☐ Continue dust suppression activities with water truck
- ☐ Continue 24-hour perimeter air monitoring and sampling
- ☐ Continue air monitoring in work zones
- ☐ Continue street sweeping activities
- ☐ Continue to decontaminate trucks prior to trucks leaving site
- ☐ Collect confirmation samples of cells CF83, when completed
- ☐ Backfill completed excavation cells with clean fill when confirmation results are received

Key Issues
None.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	$50,000.00	$27,357.28	$22,642.72	45.29%
Intramural Costs				

Total Site Costs	$50,000.00	$27,357.28	$22,642.72	45.29%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

www.epaosc.net/HoughPlace